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VIA ECF

The Honorable Sidney H. Stein
United States District Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Nadine Menendez, (S4) 23-cr-490 (SHS)

Dear Judge Stein:

I am writing to Your Honor to follow up on our colloquy with the Court this morning, relating to the fact that our jury will commence deliberations on Friday afternoon.

As the Court knows, actual and potential jurors repeatedly have registered concern about the length of this trial. According to my recollection, on one occasion, when the Court talked with the jurors about the need for an adjournment of trial, at least one of the jurors appeared upset, noting something to the effect of, "You know, we have lives."

Given these circumstances, and given the length of trial and that the case will be going to the jury on Friday afternoon, in order to ensure that no juror feels any coercion, we respectfully request the brief supplemental instruction below:

Ladies and gentlemen, you are commencing your deliberations on Friday afternoon. This has been a long trial, and all the participants know that this has entailed substantial sacrifice by the jurors. Accordingly, I emphasize to you that your deliberations must be conscientious, that no juror should surrender her or his own views unless persuaded to do so, and that no juror should feel any pressure of any kind to reach a verdict before the coming weekend. The Court and the parties will remain today for as long as the jury wishes to deliberate, but the jury should feel no time pressure about reaching a verdict today, as opposed to deciding to return on Monday to continue deliberations.

In addition, I believe I am required to renew my Rule 29 motion prior to the jury commencing deliberations. I respectfully do so.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Barry Coburn". The signature is fluid and cursive, with the first name "Barry" being more prominent than the last name "Coburn".

Barry Coburn